

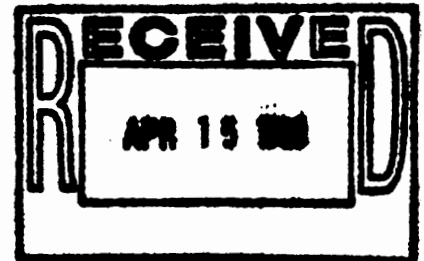
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DEPARTMENT OF HEALTH SERVICES  
DIVISION OF ENVIRONMENTAL HEALTH

April 9, 1998



California Integrated Waste Management Board  
8800 Cal Center Drive, MS-29  
Sacramento, CA 95826

Attention: Sue Happersberger, Supervisor, LEA Support Services Branch

Subject: Final Report 1996/1997 Pilot Waste Tire Enforcement Grant

Dear Ms. Happersberger,

The Imperial County Local Enforcement Agency was awarded a grant in the sum of \$8271.00 to conduct a survey of the tire dealers and auto dismantlers throughout the County of Imperial.

On January 16, 1998, the LEA forwarded to your office a report of its completed survey, detailing all activities, time and mileage expended by all concerned staff and specific analysis of who were or were not using registered waste tire haulers and who were or were not using or properly using waste tire hauler manifests.

In addition, those sites having on-site more than 500 waste tires (generators) were brought to the attention of your Board's enforcement personnel (Brad Williams) who promptly wrote warning letters and where necessary enforcement orders.

Imperial County LEA's final report is attached and final payment (10% withheld = \$827.10) requested.

We were happy to participate in this survey.

Sincerely,

Thomas L. Wolf, Manager  
Division of Environmental Health Services



By: Gerald Quick, REHS III  
Local Enforcement Agency - Permitting

**FINAL REPORT**  
**1996/97 Pilot Waste Tire Enforcement Grant**  
**County of Imperial**  
**Waste Tire Generator Facilities Survey**

In accordance with CIWMB Grant availability letter of February 16, 1998, option #2, Surveillance, was selected by the LEA. Subsequently a grant was issued to the LEA (Grantee) whose responsibility was to conduct WTF surveys of tire dealers and auto dismantlers which accept or store waste tires on site. The intent of this activity is to reinforce the tire dealers' and/or auto dismantlers' responsibility to use "registered waste tire haulers" for waste tire removal and to subsequently maintain "waste tire manifests" that document waste tire removal. In addition to identifying to the Board's Enforcement Branch those tire dealers and auto dismantlers that are not in compliance with hauler/manifest requirements, the LEA will also identify and report sites that may be in violation of WTF permit requirements.

- **A summary of the objectives of the entire grant program and how these objectives were accomplished.**
  1. Telephone and business directories as well as listings provided by CIWMB were utilized in developing a list of tire dealers and auto dismantlers.
  2. Applicable state laws, regulations, copies of manifests, hauler decals and a survey informational letter was mailed to all known dealers and dismantlers.
  3. After waiting a reasonable length of time for any response from the generator, actual site surveys were conducted. Determinations were made as to their proper use of haulers/manifests and or possible violations of WTF permit requirements. Furthermore, the generators were fully informed as to the requirements of using registered haulers and maintaining manifests.
  4. Complete time and material accounting procedures were used in order to determine if the grant funding was cost effective.
  5. Details of objective were quite specific in grant application.
- **Any findings, conclusions, or recommendations for follow-up or ongoing activities that might result from successful completion of the program.**
  1. In accordance with the responsibilities under the grant, successful completion of the survey program was accomplished.

2. It can be reasonably concluded that about 5% of the jurisdiction's tire generators will change by either new ownership, out-of-business or new business location. Such would require on-going surveillance and/or enforcement programs.
3. An on-going program would be required to assure that generators complied with the regulations. This could be through education & persuasion/legal enforcement proceedings.
4. Annual grants should be provided which cover local costs.
  - **A description of aspects of the program that you feel was successful. Were the methods used cost effective? Would they be worth doing again. Also describe program elements that were less effective and that you would not recommend to others. Provide an honest assessment of these less effective elements. We can use this information to help future grantees implement their programs.**
1. The mailing of regulations, etc. to the generators along with the letter of purpose removed a lot of the usual apprehension of the generator when the LEA entered his/her premises. This mailing was cost effective.
2. The potential permit requirement violations were generally resolved within a month. Only one facility has had to be issued an enforcement order.
3. We couldn't ascertain any aspect of our program which would be considered so ineffective that it wouldn't be recommended to others.
4. Enforcement activities present local problems. The lack of financial support for State mandated programs assigned to CIWMB rather than the LEA will not be endorsed and supported by the County Board of Supervisors. Under present legislature, any fines levied through court action goes to CIWMB. Not to the LEA. Nearly all court action appears to be located in San Diego or Los Angeles (Administrative Law Judge).
5. Surveillance is always worth repeating, provided grants are provided.
  - **A statement of future intent of the grantee to further develop the program.**
1. Without adequate funding and authorization by the governing body, the LEA cannot provide a statement of future intent.
2. However, the LEA does investigate any complaint relative to waste tires and where violations are noted we will attempt to have it corrected. If the violator

does not comply, the case will be forwarded to CIWMB Tire Enforcement Branch.

- **How many sites were visited? What were the results of your visit, i.e., number of sites in violation of permit requirements, number of sites using unregistered haulers, and number of sites with manifesting violations?**

1. 106 sites were visited.
2. 3 sites were in violation of permit requirements.
3. 55 sites were using unregistered haulers.
4. 68 sites had manifesting violations.
5. 18 sites found to be out of business.

- **What enforcement actions were taken, i.e., number of violation/warning letters issued and number of waste tires removed, if applicable.**

1. Enforcement actions were referred to CIWMB.
2. Our grant was not for enforcement.

- **Submit copies of all surveys conducted, if not previously sent.**

1. All were previously sent.

Q:\jj:f:\users\jackie\pilotgrt.doc